

EXHIBIT 74



1 A No.

2 Q Why were you calling about particular
3 applicants?

4 A Just because their parents or someone had
5 flagged me that they were -- that the applicants
6 were applying and to make me aware of it, and,
7 therefore, I passed on to admissions, as was, I
8 recollect, my practice, that I had been contacted
9 and with the expectation that they would just let me
10 know so that I could manage the relationship with
11 whomever it was that had proffered information about
12 a candidate.

13 Q Did you ever ask a director of admissions of
14 MIT to talk to a particular candidate's family?

15 A Not that I recollect.

16 Q Did you ever discuss [REDACTED] with any
17 MIT admissions personnel?

18 A I believe so.

19 Q What do you recall about that?

20 A There was a fellow -- the reason I say I
21 believe so is because I don't remember if I knew
22 that [REDACTED] at the time.

23 There was a fellow who worked at
24 Lehman Brothers in either [REDACTED]. I
25 don't remember. I knew him a little bit from years

1 prior, and I hadn't heard from him in many years.

2 We weren't close.

3 And he -- I do remember he called me and --
4 to let me know that [REDACTED] -- I -- it
5 [REDACTED] as I learned at some point,
6 were applying to MIT.

7 Q And what did he ask you to do?

8 A He didn't ask me to do anything. He just
9 let me know.

10 Q So this was -- what was this person's name?

11 A [REDACTED].

12 Q And what was your relationship with
13 [REDACTED]?

14 A I just answered that.

15 Q Your only relationship was a work
16 relationship?

17 A Well, I didn't even work with him. I just
18 knew him because we were working at the same firm.

19 Q And your recollection is that he called you
20 to let you know that his children were applying or
21 his child was applying?

22 A Yes.

23 Q And then what did you do with that
24 information?

25 A I don't remember what I did with it. I